

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

DEVON D. ARCHER, BEVAN T. COONEY, HUGH
DUNKERLEY, JASON W. GALANIS, JOHN P.
GALANIS, GARY T. HIRST, MICHELLE A.
MORTON, and FRANCISCO MARTIN,

Defendants.

16 Civ. 3505 (WHP) (AJP)

ANSWER OF
GARY HIRST

Defendant Gary Hirst (“Mr. Hirst”), by his attorneys, Wiand Guerra King P.A., files this pleading as his answer to the Amended Complaint in this action dated November 14, 2016 (Doc. 88), together with all purported claims and purported causes of action therein (collectively the “Amended Complaint”). Mr. Hirst reserves the right to amend this answer to the fullest extent consistent with the law.

1. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment of the United States Constitution, and all applicable sections, amendments and articles of any and all State Constitutions, including but not limited to the Constitution of the State of Florida (collectively referred to hereinafter as the “Fifth Amendment”), to the allegations contained in paragraph 1 of the Amended Complaint.

2. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 2 of the Amended Complaint.

3. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 3 of the Amended Complaint.

4. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 4 of the Amended Complaint.

5. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 5 of the Amended Complaint.

6. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 6 of the Amended Complaint.

7. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 7 of the Amended Complaint.

8. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 8 of the Amended Complaint.

9. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 9 of the Amended Complaint.

10. Paragraph 10 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 10 of the Amended Complaint.

11. Paragraph 11 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 11 of the Amended Complaint.

12. Paragraph 12 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 12 of the Amended Complaint.

13. Paragraph 13 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 13 of the Amended Complaint.

14. Paragraph 14 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 14 of the Amended Complaint.

15. Paragraph 15 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 15 of the Amended Complaint.

16. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 16 of the Amended Complaint.

17. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 17 of the Amended Complaint.

18. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 18 of the Amended Complaint.

19. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 19 of the Amended Complaint.

20. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 20 of the Amended Complaint.

21. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 21 of the Amended Complaint.

22. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 22 of the Amended Complaint.

23. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 23 of the Amended Complaint.

24. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 24 of the Amended Complaint.

25. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 25 of the Amended Complaint.

26. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 26 of the Amended Complaint.

27. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 27 of the Amended Complaint.

28. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 28 of the Amended Complaint.

29. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 29 of the Amended Complaint.

30. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 30 of the Amended Complaint.

31. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 31 of the Amended Complaint.

32. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 32 of the Amended Complaint.

33. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 33 of the Amended Complaint.

34. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 34 of the Amended Complaint.

35. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 35 of the Amended Complaint.

36. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 36 of the Amended Complaint.

37. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 37 of the Amended Complaint.

38. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 38 of the Amended Complaint.

39. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 39 of the Amended Complaint.

40. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 40 of the Amended Complaint.

41. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 41 of the Amended Complaint.

42. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 42 of the Amended Complaint.

43. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 43 of the Amended Complaint.

44. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 44 of the Amended Complaint.

45. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 45 of the Amended Complaint.

46. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 46 of the Amended Complaint.

47. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 47 of the Amended Complaint.

48. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 48 of the Amended Complaint.

49. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 49 of the Amended Complaint.

50. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 50 of the Amended Complaint.

51. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 51 of the Amended Complaint.

52. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 52 of the Amended Complaint.

53. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 53 of the Amended Complaint.

54. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 54 of the Amended Complaint.

55. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 55 of the Amended Complaint.

56. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 56 of the Amended Complaint.

57. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 57 of the Amended Complaint.

58. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 58 of the Amended Complaint.

59. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 59 of the Amended Complaint.

60. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 60 of the Amended Complaint.

61. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 61 of the Amended Complaint.

62. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 62 of the Amended Complaint.

63. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 63 of the Amended Complaint.

64. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 64 of the Amended Complaint.

65. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 65 of the Amended Complaint.

66. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 66 of the Amended Complaint.

67. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 67 of the Amended Complaint.

68. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 68 of the Amended Complaint.

69. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 69 of the Amended Complaint.

70. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 70 of the Amended Complaint.

71. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 71 of the Amended Complaint.

72. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 72 of the Amended Complaint.

73. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 73 of the Amended Complaint.

74. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 74 of the Amended Complaint.

75. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 75 of the Amended Complaint.

76. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 76 of the Amended Complaint.

77. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 77 of the Amended Complaint.

78. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 78 of the Amended Complaint.

79. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 79 of the Amended Complaint.

80. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 80 of the Amended Complaint.

81. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 81 of the Amended Complaint.

82. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 82 of the Amended Complaint.

83. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 83 of the Amended Complaint.

84. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 84 of the Amended Complaint.

85. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 85 of the Amended Complaint.

86. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 86 of the Amended Complaint.

87. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 87 of the Amended Complaint.

88. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 88 of the Amended Complaint.

89. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 89 of the Amended Complaint.

90. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 90 of the Amended Complaint.

91. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 91 of the Amended Complaint.

92. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 92 of the Amended Complaint.

93. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 93 of the Amended Complaint.

94. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 94 of the Amended Complaint.

95. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 95 of the Amended Complaint.

96. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 96 of the Amended Complaint.

97. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 97 of the Amended Complaint.

98. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 98 of the Amended Complaint.

99. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 99 of the Amended Complaint.

100. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 100 of the Amended Complaint.

101. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 101 of the Amended Complaint.

102. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 102 of the Amended Complaint.

103. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 103 of the Amended Complaint.

104. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 104 of the Amended Complaint.

105. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 105 of the Amended Complaint.

106. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 106 of the Amended Complaint.

107. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 107 of the Amended Complaint.

108. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 108 of the Amended Complaint.

109. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 109 of the Amended Complaint.

110. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 110 of the Amended Complaint.

111. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 111 of the Amended Complaint.

112. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 112 of the Amended Complaint.

113. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 113 of the Amended Complaint.

114. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 114 of the Amended Complaint.

115. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 115 of the Amended Complaint.

116. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 116 of the Amended Complaint.

117. Mr. Hirst invokes his right against self-incrimination under the Fifth Amendment to the allegations contained in paragraph 117 of the Amended Complaint.

118. Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 118 of the Amended Complaint.

119. Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 119 of the Amended Complaint.

120. Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 120 of the Amended Complaint.

121. Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 121 of the Amended Complaint.

122. Paragraph 122 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 122 of the Amended Complaint.

123. Paragraph 123 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 123 of the Amended Complaint.

124. Paragraph 124 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 124 of the Amended Complaint.

125. Paragraph 125 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 125 of the Amended Complaint.

126. Paragraph 126 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 126 of the Amended Complaint.

127. Paragraph 127 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 127 of the Amended Complaint.

128. Paragraph 128 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 128 of the Amended Complaint.

129. Paragraph 129 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 129 of the Amended Complaint.

130. Paragraph 130 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 130 of the Amended Complaint.

131. Paragraph 131 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 131 of the Amended Complaint.

132. Paragraph 132 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 132 of the Amended Complaint.

133. Paragraph 133 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 133 of the Amended Complaint.

134. Paragraph 134 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 134 of the Amended Complaint.

135. Paragraph 135 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 135 of the Amended Complaint.

136. Paragraph 136 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 136 of the Amended Complaint.

137. Paragraph 137 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 137 of the Amended Complaint.

138. Paragraph 138 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 138 of the Amended Complaint.

139. Paragraph 139 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 139 of the Amended Complaint.

140. Paragraph 140 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 140 of the Amended Complaint.

141. Paragraph 141 purports to state a legal conclusion/opinion as to which no response is required. To the extent that any response is required, Mr. Hirst invokes his right against self- incrimination under the Fifth Amendment to the allegations contained in paragraph 141 of the Amended Complaint.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

142. The Amended Complaint fails to set forth facts sufficient to state causes of action against Mr. Hirst.

SECOND AFFIRMATIVE DEFENSE

143. The Amended Complaint's allegations of fraud are not pleaded with the particularity that the Federal Rules of Civil Procedure require. The lack of particularity makes it impossible for Mr. Hirst to determine at this time whether additional affirmative

defenses may exist. Mr. Hirst reserves the right to assert additional affirmative defenses once the particular nature of the relevant alleged circumstances and alleged events are determined.

THIRD AFFIRMATIVE DEFENSE

144. The claims alleged in the Amended Complaint are barred, in whole or in part, by the applicable statutes of limitations.

WHEREFORE, Mr. Hirst prays for relief as follows: (i) For judgment dismissing the Amended Complaint with prejudice; (ii) for costs of suit and reasonable attorneys' fees as allowed by law; and (iii) for such other and further relief as the Court deems just and proper.

Date: November 14, 2016
Tampa, Florida

Respectfully submitted,

s/Matthew J. Mueller

Matthew J. Mueller, FBN 47366
mmueller@wiandlaw.com
Gianluca Morello, FBN 034997
gmorello@wiandlaw.com
5505 West Gray Street
Tampa, FL 33609
Tel.: (813) 347-5100
Fax: (813) 347-5198

Attorneys for Defendant Gary Hirst